

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO.
v.	:	DATED FILED: _____
MARC T. DILULLO	:	VIOLATION: 7 U.S.C. §§ 7711(a) and 7734 (Unauthorized Movement of Plant Pests - 1 count)

I N F O R M A T I O N

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this information:

1. Defendant MARC T. DILULLO was a resident of Birdsboro, Pennsylvania and worked in Mohnton, Pennsylvania.
2. Under the authority of the Plant Protection Act, a Plant Protection and Quarantine (PPQ) permit is required for the importation, interstate movement and environmental release of plant pests. The purpose of the permitting process is to protect United States agriculture by preventing the introduction of invasive plant species, exotic insects, and foreign diseases. It is unlawful to knowingly move any plant pest into or through the United States, or knowingly accept delivery of such a plant pest without a permit, unless the pest is dried or preserved. The Coleoptera order of beetle is restricted from being imported into the United States without a PPQ permit from the United States Department of Agriculture due to the fact that the larvae feed on plant roots while the adults feed on the aerial portion of the plant, causing damage to the growing crops.
3. On or about May 8, 2008, an international express mail parcel containing 25 live

beetles of the Coleoptera order arrived at the United States Post Office in Mohnton, Pennsylvania, without the PPQ permit required by federal regulation. The parcel was addressed to MARC DILULLO, with a return address in Taiwan. Defendant DILULLO arrived at the post office and attempted to claim the parcel.

4. DILULLO knew that it is illegal to purchase and receive shipments of live beetles.

5. On or about May 8, 2008, in Mohnton, in the Eastern District of Pennsylvania, and elsewhere, defendant

MARC T. DILULLO

knowingly imported and moved in interstate commerce prohibited plant pests, that is, 25 live beetles of the Coleoptera order, and did so without the permit required by federal regulation.

In violation of Title 7, United States Code, Sections 7711 and 7734.

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LAURIE MAGID  
Acting United States Attorney